

UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:

CASE NO. 10-01096 ESL

JOSÉ MIGUEL DE JESÚS MIRANDA

CHAPTER 13

DEBTOR(S)

DEBTOR'S REQUEST FOR
APPOINTMENT OF SPECIAL COUNSEL

TO THE HONORABLE COURT:

COMES NOW, Debtor represented by the undersigned counsel and very respectfully states:

1. Prior to the filing of the present case Debtor has been engaged in a civil case before the Court of First Instance, Superior Court of San Juan, Case number KDI 1998-0555 (702).

2. The above-referred action is in regards to the objection of an increase in the domestic support obligation paid to Debtor's two sons, the retroactive application of said increase and the collection efforts of the alleged amounts owed.

3. This pending Commonwealth-court action has become very technical inasmuch it involves the calculation of the amount owed by crediting of certain payments and other credits, the submission of documentary evidence and the overall litigation of the case in order to define Debtor's domestic support obligation. Due to the very nature of the action and the procedures in such determination the same has become very contentious.

3. The proposed counsel, **Nydia I. Espino Valcárcel**, has been representing debtor in this case, and has the knowledge and experience to successfully and thoroughly continue with Debtor's legal representation in this matter.

4. The terms and conditions of the professional services contract are those contained in the proposed counsel's verified statement attached hereto identified as Attachment I.

5. To the best of Debtor's knowledge information and belief, the proposed counsel does not hold or represent any interest adverse to the estate, has no connections with Debtor, any creditor or party in interest or their respective attorneys and accountants or with the Office of the United States Trustee or any of its employees.

6. Furthermore, to the best of Debtor's knowledge information and belief, the proposed counsel is a disinterested party as defined in the Bankruptcy Code.

VERIFICATION

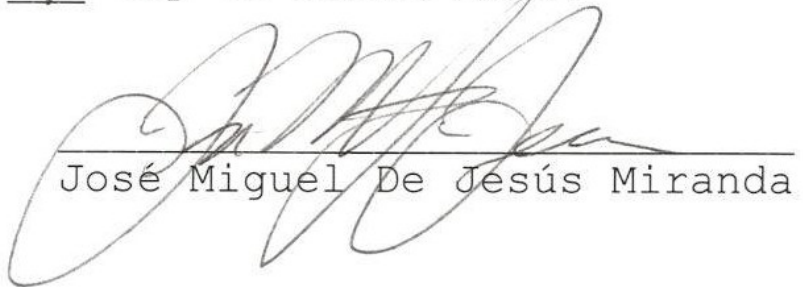
I, José Miguel De Jesús Miranda, of legal age, married, university professor, and a resident of San Juan, Puerto Rico under penalty of perjury declare that:

1. My name and personal circumstances are those stated above.

2. I am the debtor in the present case.

3. That the information provided above is true and correct
to the best of my knowledge information and belief.

In Bayamón, Puerto Rico, this 4 day of March 2010.


José Miguel De Jesús Miranda

RESPECTFULLY SUBMITTED.

In Bayamón, Puerto Rico, this 4 day of March 2010.

HERMAN F. VALENTÍN & ASSOCIATES

P.O. Box 1888
Bayamón, PR 00960-1888
Tel. (787) 200-5426
Fax (787) 200-5428

By: 

Herman F. Valentín Figueroa
USDC-PR # 201904

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CASE NO. 10-01096 ESL

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DEBTOR(S)

PROPOSED COUNSEL'S VERIFIED STATEMENT

I, **Nydia I. Espino Valcárcel**, of legal age, single, licensed attorney in the Commonwealth of Puerto Rico and a resident of Trujillo Alto, Puerto Rico declare that:

1. My name and personal circumstances are those stated above.

2. I have been admitted to the practice of law in the Commonwealth of Puerto Rico since 1985, I am currently in good standing before the Supreme Court of Puerto Rico and I have been continuously practicing law within this jurisdiction concentrating in Family Law and matters related to this practice; i.e. divorce, domestic support, visitation rights, etc.

3. Neither I nor any member of my Firm holds or represents any interest adverse to the estate of the above-named debtor.

4. I or my Firm hold no connections with the debtor, any creditor or other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed by the United States Trustee.

5. I am, and each member of my Firm is, a "*disinterested person*" as that term is defined in 11 U.S.C. § 101(14).

6. I have not agreed to share with any person, except members of my Firm, the compensation to be paid for the services rendered in this case.

7. The terms of compensation agreed-to are as follows: I have not received a retainer in this case and services will be billed at an hourly rate of \$100.00 plus expenses as approved by the Bankruptcy Court.

8. I will amend this statement immediately upon my learning that: (a) any of the representations made herein are incorrect; or, (b) there is any change of circumstance relating thereto.

9. I have reviewed the provisions of L.B.R. 2016-1 and 11 U.S.C. § 101(14).

10. I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge information and belief.

In San Juan, Puerto Rico, this 26 day of February 2010.



Nydia Ivonne Espino Valcárcel